

BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, P.C.  
PATRICIA N. SYVERSON (CA SBN 203111)  
MANFRED P. MUECKE (CA SBN 222893)  
600 W. Broadway, Suite 900  
San Diego, California 92101  
psyverson@bffb.com  
mmuecke@bffb.com  
Telephone: (619) 798-4593

BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, P.C.  
ELAINE A. RYAN (*Pro Hac Vice*)  
CARRIE A. LALIBERTE (*Pro Hac Vice*)  
2325 E. Camelback Rd. Suite 300  
Phoenix, AZ 85016  
eryan@bffb.com  
claliberte@bffb.com  
Telephone: (602) 274-1100

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

TARA DUGGAN, et al.,  
  
Plaintiffs,  
  
v.  
  
TRI-UNION SEAFOODS, LLC,  
  
Defendant.

Case No. 3:19-cv-02562-WHO

**STIPULATION TO EXTEND TIME FOR  
PARTIES TO EXCHANGE INITIAL  
DISCLOSURES UNDER F.R.C.P. 26(a)  
(L.R. 6-1, FRCP 26(a))**

Pursuant to Local Rule 6-1 and Fed. Rule Civ. Pro. 26(a), Plaintiffs Tara Duggan, et al. (“Plaintiffs”) and Defendant, Tri-Union Sea Foods, LLC (“Defendant” and together with Plaintiffs, the “Parties”) by and through their respective counsel of record hereby stipulate and agree as follows:

WHEREAS, on December 10, 2019, the Court set the Case Management Conference (“CMC”) for March 3, 2020;

WHEREAS, on January 29, 2020, the Parties filed a stipulation for Plaintiffs to file a Second Amended Complaint (“SAC”) and for Defendant to file an Answer in response (D.E. 52);

WHEREAS, on January 31, 2020, the Court granted the Parties stipulation, ordering Plaintiffs to file the SAC by end of day on January 31, 2020, and for Defendant to file an answer on or before February 28, 2020 (D.E. 53);

WHEREAS, on January 31, 2020 Plaintiffs filed the SAC (D.E. 54);

WHEREAS, on February 11, 2020, the Parties met and conferred 21 days in advance of the CMC as required by Rule 26(f) and agreed to extend the date for which initial disclosures under Rule 26(a) were to be exchanged from February 25, 2020 to March 2, 2020;

WHEREAS, the Parties shall submit their related joint case management statement as scheduled on February 25, 2020 for the CMC set for March 3, 2020.

NOW, THEREFORE IN CONSIDERATION OF THE FOREGOING IT IS HEREBY STIPULATED by and between the Parties that:

1. The Parties shall exchange initial disclosures under Rule 26(a) on March 2, 2020.

Respectfully submitted,

Dated: February 25, 2020

BONNETT FAIRBOURN FRIEDMAN  
& BALINT, P.C.

By: Patricia N. Syverson  
Patricia N. Syverson  
Attorney for Plaintiffs, Tara Duggan, et al

Dated: February 25, 2020

PARKS & SOLAR, LLP

By: /s/Robert J. Parks  
Robert J. Parks  
Attorney for Defendant, Tri-Union Seafoods, LLC

1  
2 Dated: February 25, 2020

VENABLE, LLP

3 By: /s/Angel A. Garganta  
4 Angel A. Garganta  
Attorneys for Defendant, COSI Seafoods, LLC

5 Dated: February 25, 2020

VENABLE, LLP

6 By: /s/William M. Sloan  
7 William M. Sloan  
Attorneys for Defendant, COSI Seafoods, LLC

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9  
10 **LOCAL RULE 5-1(i)(3) ATTESTATION**

11 Pursuant to Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf  
12 the filing is submitted, concur in the filing of this Stipulation and have authorized the filing of this  
13 Stipulation.

14 Dated: February 25, 2020

By: s/Patricia N. Syverson  
Patricia N. Syverson

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail notice list, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice list.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 25, 2020.

/s/ Patricia N. Syverson  
Patricia N. Syverson